

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE	Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS, INC., et. al.	Chapter 11
Debtor.	

CLAIMANT'S MOTION FOR DISCOVERY AS TO DEBTORS' ONE HUNDRED
SEVENTY-THIRD OMNIBUS OBJECTION TO CLAIMS AS TO INTERROGATORIES
AND THE ISSUANCES OF SUBPOENAS DUCES TECUM

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW the creditor, Charles L. Kuykendall, by and through his attorneys, Dwyer
& Wing, P.C. and request authority to undertake discovery as follows:

1. Submit a subpoena duces tecum to Citigroup Global Markets Inc. requesting the following documents:
 - a. Copies of all deferred compensation agreements as to Charles L. Kuykendall.
 - b. Copies of all notices regarding deferred compensation agreements sent to Charles L. Kuykendall relating to his deferred compensation agreement originating with E.F. Hutton.
 - c. Copies of all communications to Charles L. Kuykendall regarding funds in his deferred compensation account being held by any company or entity other than Citigroup Global Markets, Inc. or another Citigroup affiliate.
 - d. Copies of any communications or statements provided to Charles L. Kuykendall regarding assurance of payment regarding funds in his deferred compensation account being held by any company or entity other than Citigroup Global Markets,

Inc. or another Citigroup affiliate.

- e. Copies of any guaranty, or substantial equivalent of a guaranty, received by Citigroup Global Markets Inc. from any company or entity other than Citigroup Global Markets, Inc. or another Citigroup affiliate with regard to deferred compensation funds or account of Charles L. Kuykendall.

With a return date to be fixed within a reasonable time from issuance.

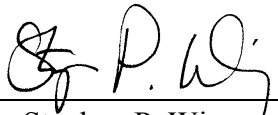
2. Pursuant to Local Rule 7033-1 for authority to propound interrogatories and requests for production of documents to the Debtor as to:

- a. Explanations as to contracts or other agreements which resulted in either LBHI or LBI retaining part of the deferred compensation plans of Charles L. Kuykendall even though he was not an employee of either entity and never had been, along with production of any documents which substantiate such answer.
- b. Interrogatories as to the flows of funds, or in the alternative of assumption of liability for funds, attributable to deferred compensation plans of Charles L. Kuykendall to LBHI and/or LBI and that dates said transfers occurred with identification or production of documents which substantiate such answers.

To be formally propounded and served in conformity with local and federal rules.

WHEREFORE the creditor, Charles L. Kuykendall, prays that the court authorize claimant #5487, Charles L. Kuykendall, to undertaken limited discovery as described above in connection with the proof of his claim against the Debtor and for such other and further relief as the court deems just and proper in the circumstances.

CHARLES L. KUYKENDALL

By: _____

Stephen P. Wing
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1503 Brady Street
Davenport, Iowa 52803
(563) 323-3000
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Certificate of Service

The undersigned certifies under penalty of perjury that he is 18 years of age or older, and that a copy of his document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing on September 19, 2011.

_____/s/_____
Stephen P. Wing
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